



**Before the Federal Communications Commission Washington, D.C. 20554**

In the Matter of Protecting against National Security Threats  
WC Docket No. 18-89  
Communications Supply Chain through FCC Programs

## **REPLY TO SECA COMMENTS**

### **NOTICE OF PROPOSED RULEMAKING REGARDING PROTECTING AGAINST NATIONAL SECURITY THREATS TO THE COMMUNICATIONS SUPPLY CHAIN THROUGH THE FCC'S E-RATE PROGRAM (WC Docket 18-89; FCC 18-42)**

The State Educational Technology Directors Association (SETDA) is a national, non-profit organization that supports state education agency leaders focused on using technology – including the high capacity broadband access made possible in part by the E-rate program - for improving teaching, learning, and school operations submits this reply to Comments based on the the State E-Rate Coordinators' Alliance ("SECA") Comments in response to the FCC's Notice of Public Rulemaking ("NPRM") released April 18, 2018 (WC Docket 18-89; FCC 18-42) These Comments address those NPRM concerns most directly related to E-rate applicant issues.

#### **Identification of Prohibited Companies**

SETDA concurs with the SECA comments in that at a minimum, E-rate service providers should be required to certify via an additional certification on existing FCC Forms 473 and/or Form 498 that the products and/or services they are proposing to applicants are fully compliant with the Commission's national security rules. In turn, E-rate applicants should be able to rely upon the certifications of their service providers to demonstrate the applicants' own compliance with such rules. By relying on service provider certifications, it should not matter whether the E-rate applicants are seeking USF support for products and/or services provided by third parties, or are simply purchasing equipment and installing it themselves. In either case, purchases would be made from certifying suppliers. SETDA also urges the Commission to incorporate service provider certifications to comprehensively include attestation(s) assuring compliance with the national security concerns related to supply chain integrity risks for each service provider and their affiliates, including manufacturers and subcontractors who may be part of any service or project involving E-rate support.

The Commission's NPRM to protect the U.S. communications supply chain against national security threats represents the first step in an important, but complex, proceeding. With specific regard to E-rate, however, the Commission should start with the simple and fair presumption —implicit in several of the



Commission's questions throughout the NPRM —that E-rate applicant compliance should be based on the assurances and certifications of its service providers, not the applicants themselves.

Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Tracy S. Weeks". The signature is written in a cursive, flowing style.

Tracy S. Weeks, Ph.D.  
Executive Director